

FILED BY *CJ* D.C.IN THE UNITED STATES DISTRICT COURT
05 SEP 30 AM 10:42 FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISIONTHOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, MEMPHISUNITED STATES OF AMERICA,)
Plaintiff,)
vs.)TRINA T. THOMAS,)
Defendant.)FILED BY *AGJ* D.C.

2005 SEP 26 PM 4:02

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, MEMPHIS

Cr. No. 04-20506-MI/P

~~MOTION GRANTED~~JON PHIPPS McCALLA
U.S. DISTRICT JUDGE*Sept. 30, 2005*

DATE

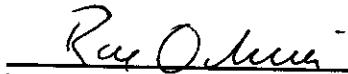
MOTION TO CONTINUE REPORT DATE

Comes now the United States of America by and through its counsel, Lawrence J. Laurenzi, Acting United States Attorney for the Western District of Tennessee, and files its Motion to Continue the report date from the present setting of October 28, 2005 until the December report date. Additional time is requested due to information received by the Bureau of Prisons (hereafter "BOP"). A material witness, who is in federal custody, has been experiencing a high risk pregnancy and is scheduled to deliver on September 27, 2005. At that time the mother and the child will be housed together for a three month period. Information from the Bureau of Prisons indicates that the issuance of a writ for this witness would require the BOP securing someone to take custody of the child. Information indicates this could impose a hard ship on the inmate's family as well as the BOP. Furthermore, the government anticipates calling this witness in another case before the court, United States v. Rhonda E. Nelson, 04-20505. This would result in two different writs and two different periods of separation for mother and child. For these reasons, we respectfully request that the report date be continued until December.

Respectfully submitted,

LAWRENCE J. LAURENZI
Acting United States Attorney

By:


V. RAE OLIVER
Assistant United States Attorney
167 N. Main, Room 800
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(#18831 Tennessee)

CERTIFICATE OF SERVICE

I, V. Rae Oliver, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing Motion to Continue has been sent via facsimile and mailed, first class postage pre-paid, to K. Jayaramen, 147 Jefferson Plaza, Ste 804, Memphis, Tennessee 38103 and Facsimile (901)522-8243.

This 2nd day of September, 2005.


V. RAE OLIVER
Assistant United States Attorney
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Notice of Distribution

This notice confirms a copy of the document docketed as number 35 in case 2:04-CR-20506 was distributed by fax, mail, or direct printing on October 3, 2005 to the parties listed.

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Honorable Jon McCalla
US DISTRICT COURT